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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

AUG - 7 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matters of)

NORTHLAND TELEPHONE COMPANY OF MAINE, INC.)

File No. _____

Notification of Inability to Comply)
With August 8, 1997 IntraLATA Toll)
Dialing Parity Implementation Deadline)

Implementation of the Local Competition)
Provisions of the Telecommunications Act)
of 1996)

CC Docket No. 96-98

TO: Chief, Common Carrier Bureau

NOTIFICATION

Northland Telephone Company of Maine, Inc. (Northland of Maine) hereby notifies the Commission that it is unable to comply with the August 8, 1997 deadline for implementation of intraLATA toll dialing parity throughout the State of Maine. At this time, Northland of Maine believes that it will be able to implement intraLATA toll dialing parity in Maine during calendar year 1998.

Preliminary Matter

Northland of Maine apologizes for its inadvertent failure to submit this Notification by the May 8, 1997 date specified in Section 51.211(c) of the Commission's Rules. The intraLATA toll dialing parity requirement and May 8, 1997 implementation deadline were included in the massive First Report And Order (Implementation of the Local Competition Provisions of the Telecommunications Act of 1996), CC Docket No. 98-98, FCC 96-325 and Second Report And Order And Memorandum Opinion And Order (Implementation of the Local

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Competition Provisions of the Telecommunications Act of 1996), CC Docket No. 98-98, FCC 96-333, which were adopted and released on August 8, 1996. The Commission's intraLATA dialing parity requirement and deadline do not appear to have received significant industry publicity at the time (at least, publicity that came to Northland of Maine's attention), and Northland of Maine consequently focused upon pending Maine proceedings relating to intrastate dialing parity without realizing that the Commission had set intraLATA toll parity deadlines. When it became aware of the Section 51.211 requirement and deadline, Northland of Maine assessed its situation and prepared this notification. It asks the Bureau to accept the document, and to consider the circumstances and alternative implementation schedule set forth herein.

Background

Northland of Maine is a local exchange carrier serving 23 exchanges in rural areas of Maine and New Hampshire (approximately 20,500 lines). Northland of Maine acquired these exchanges from Maine Telecommunications Group, Inc. (MTG) and MCTA, Inc (MCTA) as part of the continuation of a transaction in which MTG and MCTA had acquired these and other exchanges from Contel of Maine and Contel of New Hampshire, respectively, in August 1994. See Maine Telecommunications Group, Inc. et al., 9 F.C.C.R. 3032, (1994).

Contel of Maine and Contel of New Hampshire had previously converted all of the exchanges to equal access on an interstate basis. Northland's local exchange customers are presently able to

presubscribe to "1+" interstate toll service. Additionally, Northland of Maine has implemented intraLATA toll dialing parity at its two exchanges in New Hampshire, in accordance with FCC and New Hampshire Public Utilities Commission regulations.

In the first quarter of 1997, ST Long Distance, Inc. dba Northland Long Distance (STLD), an affiliate of Northland of Maine, began providing interstate long distance toll service(s) within the States of Maine, New Hampshire and Vermont.

**Northland of Maine Cannot Meet
The Commission's August 8, 1997 Deadline**

In order to provide full 2-PIC¹ presubscription in its Maine exchanges, Northland of Maine needs to obtain and install hardware upgrades and multiple software packages including Release 20 software in certain end offices. This new hardware/software will cost over \$ 135,500.00, and will take over 4 months to order, obtain, install, test and make ready for commercial operation. Hence, if Northland of Maine were required to start the process today, it would not be able to convert to full 2-PIC operation until December 1997 at the very earliest.

In addition, Northland of Maine is also regulated by the Maine Public Utilities Commission (PUC), which has not yet issued rules governing Northland of Maine's implementation and scheduling of

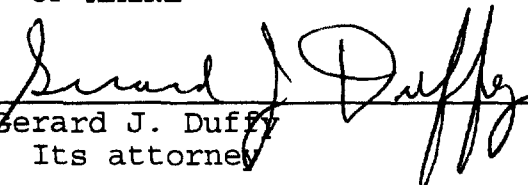
¹ The term "2-PIC" means "two presubscribed interexchange carriers," and allows customers to presubscribe to a telecommunications carrier for all interLATA toll calls, and to presubscribe to another telecommunications carrier (including, but not limited to, the customer's local exchange carrier) for all intraLATA toll calls.

intraLATA toll dialing parity. Northland of Maine does not want itself and its local exchange customers to get caught in the middle of potentially different or conflicting federal and state requirements, and believes that all parties will be best served by a one-time conversion that fully complies with both federal and PUCs dialing parity requirements.

In light of the switch upgrades it needs to complete and of the present status and prospective scheduling of the PUCs proceedings, Northland of Maine believes that it can complete its conversion of its Maine Exchanges to full 2-PIC status within calendar year 1998.

Respectfully submitted,

**NORTHLAND TELEPHONE COMPANY
OF MAINE**


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Its attorney

August 7, 1997

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